

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

V.

EDWARD CONSTANTINESCU,
PERRY "PJ" MATLOCK,
JOHN RYBARCZYK,
GARY DEEL,
STEFAN HRVATIN,
TOM COOPERMAN,
MITCHELL HENNESSEY,
DANIEL KNIGHT.

No. 4:22-CR-00612-S

MOTION TO WITHDRAW AS COUNSEL OF RECORD

On March 5, 2024, the undersigned attorney entered an appearance in the above numbered cause as an associate attorney at the law firm representing Defendant Edward Constantinescu. On September 20, 2024, the undersigned attorney left the law firm representing Defendant Constantinescu; and on October 1, 2024, the undersigned attorney joined a different firm. This Motion to Withdraw is now respectfully submitted to the Court requesting the undersigned attorney to be formally removed from this matter.

Dated: July 9, 2025

Respectfully submitted,



Emily Klair Bloom
SBOT No. 24123503
ebloom@hannaplaut.com
HANNA & PLAUT, LLP
211 East 7th Street
Austin, Texas 78701
(512) 472-7700